

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JEROME JETER	:	VIOLATIONS:
MIKAL BLAKELY	:	18 U.S.C. § 1951(a) (conspiracy to
MAURICE DAVIS	:	interfere with interstate commerce by
	:	robbery - 1 count)
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery - 2
	:	counts)
	:	18 U.S.C. § 924(c)(1)(A) (using and
	:	carrying a firearm during a crime of
		violence - 2 counts)
		18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Sally Beauty Supply store located at 2401 Venango Street, Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce.
2. The A-Plus Sunoco Store located at 3200 Richmond Street, Philadelphia, Pennsylvania, was a business engaged in and affecting interstate commerce.

THE ROBBERY CONSPIRACY

3 On or about December 23, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEROME JETER,
MIKAL BLAKELY, and
MAURICE DAVIS**

conspired and agreed together to commit robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendants JETER, BLAKELY, and DAVIS conspired to unlawfully take and obtain money from the person and presence of another and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that:

4. Defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS executed the armed robberies of the Sally Beauty Supply store, located at 2401 Venango Street, and the A-Plus Sunoco Store, located at 3200 Richmond Street, both in Philadelphia, Pennsylvania.

5. In each of the robberies, defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS drove together to the targeted store, where at least two of the conspirators entered the store and stole money at gunpoint, after which the defendants fled the scene in a Jeep Grand Cherokee.

OVERT ACTS

In furtherance of the conspiracy, defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS committed the following overt acts in the Eastern District of Pennsylvania on or about December 23, 2004:

1. Defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS drove to the Sally Beauty Supply store located at 2401 Venango Street, Philadelphia, Pennsylvania.
2. In the presence of and with the knowledge of defendants MIKAL BLAKELY and MAURICE DAVIS, defendant JEROME JETER entered the Sally Beauty Supply store with a loaded Colt .38 caliber revolver, serial number 893271, for the purpose of committing armed robbery. During the robbery, JETER attempted to disguise his appearance, brandished the revolver, and demanded money from the store employees.
3. After obtaining money from an employee of the Sally Beauty Supply store, defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS drove to the A-Plus Sunoco Store located at 3200 Richmond Street, Philadelphia, Pennsylvania.
4. Defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS entered the A-Plus Sunoco Store for the purpose of committing armed robbery.
5. Defendants JEROME JETER, MIKAL BLAKELY, and MAURICE DAVIS attempted to conceal their identities by disguising themselves.
6. Defendant JEROME JETER carried a Colt .38 caliber revolver, serial number 893271, into the A-Plus Sunoco Store and brandished the revolver, as defendants MIKAL BLAKELY and MAURICE DAVIS took money out of the cash registers.

7. After obtaining money from the A-Plus Sunoco Store, defendants JEROME JETER, MIKAL BLAKELY and MAURICE DAVIS fled the scene in a Jeep Grand Cherokee.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1, 4, and 5 and overt acts 1 through 3 of Count One are incorporated here.
2. On or about December 23, 2004, in the Eastern District of Pennsylvania, defendants

**JEROME JETER,
MIKEL BLAKELY, and
MAURICE DAVIS**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants JETER, BLAKELY, and DAVIS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, approximately \$136 in cash, from the person and presence of employees of the Sally Beauty Supply store located at 2401 Venango Street, Philadelphia, Pennsylvania, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, and property in their custody and possession belonging to the store, that is, by pointing a loaded Colt .38 caliber revolver, serial number 893271, and demanding cash.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2004, in the Eastern District of Pennsylvania,
defendants

**JEROME JETER,
MIKEL BLAKELY, and
MAURICE DAVIS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a loaded Colt .38 caliber revolver, serial number 893271, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, as charged in Count One of this indictment, and interference with interstate commerce by robbery, as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 2, 4, and 5 and overt acts 3 through 7 of Count One are incorporated here.
2. On or about December 23, 2004, in the Eastern District of Pennsylvania, defendants

**JEROME JETER,
MIKEL BLAKELY, and
MAURICE DAVIS**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants JETER, BLAKELY, and DAVIS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, cash, from the person and presence of employees of the A-Plus Sunoco Store located at 3200 Richmond Street, Philadelphia, Pennsylvania, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, and property in their custody and possession belonging to the store, that is, by pointing a loaded Colt .38 caliber revolver, serial number 893271, and demanding cash.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2004, in the Eastern District of Pennsylvania,
defendants

**JEROME JETER,
MIKEL BLAKELY, and
MAURICE DAVIS**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a loaded Colt .38 caliber revolver, serial number 893271, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, interference with interstate commerce by robbery, as charged in Count Four of this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**